

CHAITMAN LLP

465 Park Avenue
New York, New York 10022
Phone & Fax: (888) 759-1114
Helen Davis Chaitman
hchaitman@chaitmanllp.com

Attorneys for Defendant

**UNITED STATES BANKRUPTCY COURT FOR
THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)
SIPA LIQUIDATION
(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

Mark Horowitz, individually and as joint tenant,

Defendant.

Adv. Pro No. 10-04748 (SMB)

**DECLARATION OF HELEN DAVIS CHAITMAN IN SUPPORT OF DEFENDANT'S
MOTION TO WITHDRAW THE REFERENCE**

HELEN DAVIS CHAITMAN hereby declares, under penalty of perjury pursuant to 28
U.S.C. § 1746, as follows:

1. I am a member of the bars of New York and New Jersey, and of this Court. I am a member of Chaitman LLP, counsel for Defendant, Mark Horowitz, individually and as joint tenant (“Defendant”).

2. I submit this Declaration in support of Defendant’s motion to withdraw the reference pursuant to 28 U.S.C. § 157(d) and Rule 5011 of the Federal Rules of Bankruptcy Procedure.

3. Attached hereto as **Exhibit A** is a true and accurate copy of the Complaint filed by the Trustee, dated December 1, 2010.

4. Attached hereto as **Exhibit B** is a true and accurate copy of Defendant’s Answer and Affirmative Defenses, dated August 14, 2015.

Dated: New York, New York
March 6, 2020

/s/ Helen Davis Chaitman
Helen Davis Chaitman